

Andree Greenberg - RE: Letter requesting for information about activities at Redwood City and Newark Plants

From: <Pat_Mapelli@cargill.com>
To: <HKifle@waterboards.ca.gov>
Date: 5/1/2012 3:01 PM
Subject: RE: Letter requesting for information about activities at Redwood City and Newark Plants
CC: <andeb@bccdc.ca.gov>, <Cameron.L.Johnson@usace.army.mil>, <paula.c.gill@usace.army.mil>, <AGreenberg@waterboards.ca.gov>, <BRthompson@waterboards.ca.gov>, <BWines@waterboards.ca.gov>, <DWhyte@waterboards.ca.gov>, <LTang@waterboards.ca.gov>, <SRLee@waterboards.ca.gov>
Attachments: PMRBR-F.pdf

Mr. Kifle:

As requested, I hand delivered Cargill's comprehensive response to the RB's questions yesterday addressed to Ms. Whyte. Attached is my cover letter I delivered yesterday. The exhibits reference in the cover letter have been intentionally left off this email due to its size in order to not load up everyone's inbox.

Thank you,

Pat

From: HKifle@waterboards.ca.gov [mailto:HKifle@waterboards.ca.gov]
Sent: Thursday, March 29, 2012 8:47 AM
To: Mapelli, Pat D. - Pat_Mapelli@cargill.com
Cc: andeb@bccdc.ca.gov; baye@earthlink.net; Cameron.L.Johnson@usace.army.mil; paula.c.gill@usace.army.mil; AGreenberg@waterboards.ca.gov; BRthompson@waterboards.ca.gov; BWines@waterboards.ca.gov; DWhyte@waterboards.ca.gov; LTang@waterboards.ca.gov; SRLee@waterboards.ca.gov
Subject: Letter requesting for information about activities at Redwood City and Newark Plants

Dear Mr. Mapelli:

Attached please find a letter requesting for information about Cargill's activities, exclusively at crystallizer Pond 4 at the Redwood City Plant and salt Pond 13 at the Newark Plant. Based on our review of the latest aerial images, Cargill appears to conduct earth moving and grading activities at these two sites. The Water Board would like an explanation the purpose and the how and why those activities are consistent with our 401 water quality certification provisions. We anticipate Cargill's comprehensive response to our questions by April 30, 2012.

If you have any questions in this matter, please contact me.

Sincerely,

-Habte



April 30, 2012

HAND DELIVERED

Ms. Dyan C. Whyte, Assistant Executive Officer
San Francisco Bay Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

Subject: Cargill Response to Regional Water Quality Control Board Request for
Information about Activities in "Pond 4" (Crystallizer 4), Redwood
City and "Pond 13" (Bittern Pond 13), Newark

Cargill file #: 2000.002:0

Dear Ms. Whyte:

This letter is in response to your request for information dated March 29, 2012 about activities in Pond 4, referred to as Crystallizer 4, located within the Redwood City Plant Site and Pond 13, referred to as Bittern Pond 13, located within the Newark Plant Site. As explained below, all of the material in Crystallizer 4 and Bittern Pond 13 is salt product within a salt pond or salt crystallizer bed and related to Cargill's salt and bittern production.

Over the years, I know many of RWQCB staff members have toured the salt harvest and other areas of our solar salt system. I would like to take this opportunity to invite your new staff or others at the Board to come see our solar salt system and salt harvesting areas.

I also want to give you some background information about Cargill's use of its Plant Sites and manufacturing processes to provide context to my more specific responses below. Today, Cargill operates two plants in the Bay Area where we harvest salt and bittern (collectively, "salt harvesting"): the Redwood City Plant Site and the Newark Plant Site. Solar salt production and salt harvesting activities have occurred at or near the Redwood City Plant Site for more than 100 years and at the Newark Plant Site for more than 80 years.

Salt harvesting in both Plant Sites is conducted as needed in order to manage our operations and more importantly, supply our customers with salt. Solar salt production starts as Cargill brings Bay water into its system of concentrators in a manner similar to more than a century of salt production in the Bay Area. Solar salt

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production involves moving brine through different portions of Cargill's concentrators and then, ultimately onto the Plant Sites. Once brine is moved onto the Plant Sites, production includes the movement, harvesting, processing and intermittent storage of salt and bittern in different locations. The production of salt and bittern, particularly the harvesting, also involves the use of heavy industrial equipment in these systems. In addition, crystallizers are routinely rolled, graded, sloped and compacted to prepare for future crystallization and harvesting. Salt floors are also routinely maintained in the Plant Sites.

It may be helpful to understand that the appearance of the Plant Sites in aerial photographs will routinely change between any two dates because of the continuous nature of Cargill's salt manufacturing operations, the different weather and seasonal changes, the volume of salt and bittern that is generated by Cargill's processes that year, and the particular stage of harvesting or storage of product being conducted by Cargill. For example, in the dry season, large amounts of salt – crystallized from brine – will be present, and readily apparent in any aerial photographs. During other times of the year the harvesting areas will be covered in brine, salts in solution, due to the rains, brine management or general salinity concentration. Similarly, stockpiles of salt and bittern product at the Plant Site may grow, move, or shrink between any two given dates. Salt has been historically stockpiled within Cargill's Plant Sites while waiting for processing, refining, packaging, or sale.

The management of the salt and harvesting activities within Cargill's Plant Site is a dynamic process that is constantly evolving, but none of these activities has an impact on water quality. As discussed further below, the aerial photographs you provided of Crystallizer 4 and Bittern Pond 13 show salts on top of salt at various stages of Cargill's salt and bittern production. As such, these photographs depict salts within salt ponds and salt beds, on top of salt floors or surrounded by brines. The activity in these two areas, as represented in the aerial photographs, is part of Cargill's salt production process.

In responding to a similar request for information about Cargill's routine salt manufacturing operations, the U.S. Army Corps of Engineers stated that the "Corps has not regulated salt-harvesting activities and, at present, does not intend to regulate those activities." A similar response from former Executive Director Will Travis of the Bay Conservation and Development Commission, concluded that "based on our observations, the harvesting and removal of bittern appears to be beneficial to the Bay and part of the salt production operation authorized under BCDC Permit No. 4-93." Copies of these similar requests for information from the Corps and BCDC, and the regulatory responses, are attached.

Now to respond to your specific questions:

Q. What is the source of material being placed in Pond 4 and 13?

- A. As noted above, the material is bittern salt from Cargill's salt and bittern production and harvesting operations. The source of material in Crystallizer 4 within the Redwood City Plant Site is from bittern salt harvesting within the Plant Site. Harvested salts have been stockpiled in Crystallizer 4 to allow the entrapped brines to drain from the salt before it is loaded into trucks and transported to our Newark Plant Site for future processing. It is salt stockpiled on top of salt in a salt crystallizer bed.

The source of material in Bittern Pond 13 within the Newark Plant Site is from bittern salt harvesting within the Newark Plant Site. These bittern salts have been stockpiled and pushed to the edge of Bittern Pond 13, to enable us to free the entrapped brine, and recover this brine for sale.

Q. How is the placement of this material in ponds part of salt production activities?

- A. Stockpiling, harvesting and movement of salt and bittern salts within Cargill's solar salt Plant Sites is common and occurs as part of salt making in the San Francisco Bay Area. These harvesting and stockpiling methods allow us to further capture salts for sale.

Q. What is the ultimate plan for this material and are the features observed in the attached aerial photographs temporary or permanent?

- A. Product in Crystallizer 4 and Bittern Pond 13 apparent in the aerial photographs attached to your letter will ultimately be further processed. As the product is sold or moved for further processing, additional product may be stockpiled in the same – or different – areas at the two Plant Sites depending upon operational needs and customer demand.

Q. If temporary, how long will these features be present and will there be a net increase of material left in the ponds?

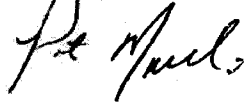
- A. Our business is to capture all of our salt and ultimately provide it as a product to our customers, not to leave it on the Plant Site. As noted above, in the course of its salt manufacturing operations Cargill may move, deplete, or re-stock stockpiled product from Crystallizer 4 and Bittern Pond 13, or other areas of the two Plant Sites. The amount of stockpiled product is dependent on our processing efforts, customer demands, operational constraints, weather, as well

as other factors. For that reason it is difficult to estimate how long these features will be present.

That being said, salt operations and salt harvesting have historically evolved in order to proactively manage our salt production process, to allow Cargill to stay competitive within the salt market we supply.

Cargill appreciates the cooperative relationship that we have with the Board. I also appreciate the opportunity to provide the RWQCB with information on Cargill's salt harvesting operation in the Bay Area. Should you have any further questions, please feel free to give me a call at (510) 790-8610 or alternatively you can email me at pat_mapelli@cargill.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Pat Mapelli", written over a horizontal line.

Pat Mapelli
Manager, Real Property
Cargill Salt
7220 Central Avenue
Newark, CA 94560

w/enclosures